

JENNIFER MOUZIS
Mouzis Criminal Defense
State Bar No. 200280
1819 K Street, Suite 200
Sacramento, California 95811
Telephone: (916) 822-8702
Facsimile: (916) 822-8712

Attorney for Defendant
JESUS VASQUEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	2:23-cr-00095-JAM
)	
Plaintiff,)	STIPULATION AND
)	ORDER TO CONTINUE STATUS
v.)	CONFERENCE
)	
JESUS VASQUEZ,)	
)	
Defendant.)	
_____)	

STIPULATION

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney Kerry Blackburn, and defendant, Jesus Vasquez, by and through his counsel, Jennifer Mouzis, hereby stipulate as follows:

- 1) By previous order, this matter was set for status on May 23, 2023.
- 2) By this stipulation, defendant now moves to continue the status conference until **July 11, 2023, at 09:00 a.m.**, and to exclude time between May 23, 2023 and July 11, 2023, under Local Code T4.
- 3) The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes

over one hundred pages of reports, photos, and search warrant documents. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

- b) Counsel for defendant desires further time to review the discovery with her client, research and investigate possible defenses, discuss any potential resolution with her client, research mitigating evidence, and present it to the prosecution. Due to defendant's move to an out of county jail and needing to have an interpreter for those visits, this is taking longer than initially expected.
 - c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 - d) The government does not object to the continuance.
 - e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
 - f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of November 8, 2022 to January 24, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
- 4) Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

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IT IS SO STIPULATED.

Dated: May 19, 2023

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kerry Blackburn
KERRY BLACKBURN
Assistant United States Attorney

Dated: May 19, 2023

/s/ Jennifer Mouzis
JENNIFER MOUZIS
Attorney for Defendant
JESUS VASQUEZ

ORDER

IT IS SO ORDERED.

Dated: May 19, 2023

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE